

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IWA-FOREST INDUSTRY PENSION PLAN, : Civil Action No. 1:21-cv-08634-PKC
Individually and on Behalf of All Others :
Similarly Situated, : CLASS ACTION
Plaintiff, : Honorable P. Kevin Castel
v. :
D-MARKET ELEKTRONIK HİZMETLER :
VE TİCARET ANONİM ŞİRKETİ a/k/a :
D-MARKET ELECTRONIC SERVICES & :
TRADING d/b/a/ HEPSIBURADA, MEHMET :
MURAT EMİRDAĞ, HALİL KORHAN ÖZ, :
HANZADE VASFIYE DOĞAN BOYNER, :
ERMAN KALKANDELEN, MEHMET EROL :
ÇAMUR, CEMAL AHMET BOZER, :
VUSLAT DOĞAN SABANCI, MUSTAFA :
AYDEMİR, TOLGA BABALI, COLLEEN A. :
DE VRIES, COGENCY GLOBAL INC., :
MORGAN STANLEY & CO. LLC, J.P. :
MORGAN SECURITIES LLC, GOLDMAN, :
SACHS & CO. LLC, BOFA SECURITIES :
INC., UBS SECURITIES LLC, and :
TÜRKOMMERCE B.V., :
Defendants. :
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**SUPPLEMENTAL DECLARATION OF ROSS D. MURRAY REGARDING NOTICE
DISSEMINATION AND REQUESTS FOR EXCLUSION RECEIVED TO DATE**

I, ROSS D. MURRAY, declare and state as follows:

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s April 20, 2023 Order Granting Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF 75) (“Notice Order”), Gilardi was appointed as the Claims Administrator¹ in connection with the proposed Settlement of the actions (the “Actions”). I oversaw the notice services that Gilardi provided in accordance with the Notice Order.

2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date (ECF 79-1) (the “Initial Mailing Declaration”). The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and if called to testify I could and would do so competently.

UPDATE ON DISSEMINATION OF THE CLAIM PACKAGE

3. As more fully detailed in the Initial Mailing Declaration, as of June 27, 2023, Gilardi had mailed 13,598 copies of the Court-approved Notice of Pendency and Proposed Settlement of Class Actions (the “Notice”) and Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Settlement Class Members and their nominees. *See* Initial Mailing Declaration, ¶11.

4. Since June 27, 2023, Gilardi has mailed an additional 631 copies of the Claim Package in response to requests from potential Settlement Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were identified and re-mailed to those new addresses. Therefore, as of July 24, 2023, Gilardi has mailed a total of 14,229 Claim Packages to potential Settlement Class Members and nominees.

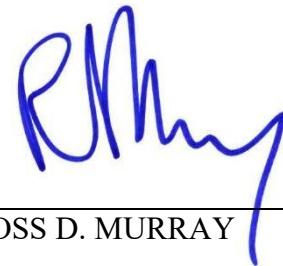
¹ Unless otherwise indicated all terms have the same meaning as set forth in the Stipulation of Settlement (ECF 73-1) (“Stipulation”).

REQUESTS FOR EXCLUSION RECEIVED TO DATE

5. Pursuant to the Notice Order, the Notice informed potential Settlement Class Members that written requests for exclusion from the Settlement Class must be mailed to *Hepsiburada Securities Litigation*, Claims Administrator, c/o Gilardi & Co. LLC, ATTN: EXCLUSIONS, P.O. Box 5100, Larkspur, CA 94977-5100, such that they are postmarked no later than July 10, 2023. At the time of the Initial Mailing Declaration, Gilardi reported that it had not received any requests for exclusion in connection with this Settlement. *See id.*, ¶16.

6. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Gilardi has not received any requests for exclusion.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 24th day of July, 2023, at San Rafael, California.



ROSS D. MURRAY